

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MIRIAM EDWARDS, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MCDERMOTT INTERNATIONAL, INC.,
DAVID DICKSON, STUART SPENCE,

Defendants

JOHN ARDEN AHNEFELDT, ROBERT
BROWER, JR. ROBERT BROWER, SR.,
KHANH L. BUI, JIGNESH CHANDARANA,
KRUITIKA CHANDARANA, AMIRA YOUSUF
CHOWDHURY, CHRISTOPHER COLIGADO,
DANIAL GAD, EDWIN HOWELL, SIOE LIE
HOWELL, DARREN HUNTING, ANNE
INGLEDEW, SHITAL MEHTA, THOMAS
CARL RABIN, ADAM SHULTZ, AMIT
SOMANI, JAYAPRAKASH SRINIVASAN,
AARTHI SRINIVASAN, CHRISTOPHER
SWEDLOW, and ALEXANDRE TAZI, on Behalf
of Themselves and All Others Similarly Situated,

Plaintiffs,

v.

DAVID DICKSON, STUART A. SPENCE, and
CHRISTOPHER A. KRUMMEL,

Defendants

**Case No. 4:18-cv-4330-GCH
(Consolidated)**

CLASS ACTION

**Case No. 4:20-cv-02539-
ASH**

CLASS ACTION

**MOTION BY §10(B) LEAD PLAINTIFF
NOVA SCOTIA HEALTH EMPLOYEES' PENSION PLAN
TO CONSOLIDATE CASES AND
TO VACATE ADDITIONAL NOTICE AND LEAD PLAINTIFF DEADLINE**

The Nova Scotia Health Employees’ Pension Plan (“§10(b) Lead Plaintiff”), by and through its undersigned counsel, pursuant to Fed. R. Civ. P. 42(a)(2) and L.R. 7.6, hereby respectfully moves this Honorable Court, at its earliest convenience during August 2020, for an Order, substantially in the form of the Proposed Order submitted herewith, that: (1) consolidates the related action, *Ahnefeldt, et al. v. Dickson, et al.*, No. 4:20-cv-02539 (S.D. Tex.) (“Related Action”), with and into the above-captioned action, *Edwards v. McDermott International, Inc., et al.*, No. 4:18-cv-4330 (S.D. Tex.), and thereafter administratively closes the Related Action, with the *Edwards* action serving as the master file; (2) reaffirms that the §10(b) Lead Plaintiff will serve as the lead plaintiff under the Private Securities Litigation Reform Act of 1995 overseeing the class-wide claims asserted in the Related Action, per this Court’s prior lead plaintiff Order of June 4, 2019 (Dkt. No. 84); (3) vacates both the PSLRA notice published in the Related Action and the purported second lead plaintiff motion deadline in the Related Action of September 16, 2020; and (4) directs the §10(b) Lead Plaintiff to issue a corrective notice, substantially in the form of Exhibit A attached to the Proposed Order, informing investors that the September 16, 2020 lead plaintiff deadline in the Related Action has been vacated. In support of this Motion, the §10(b) Lead Plaintiff respectfully submits the accompany Memorandum of Law and the Proposed Order and all supporting documents and exhibits.

Dated: July 28, 2020

Respectfully submitted,
POMERANTZ LLP

/s/Matthew L. Tuccillo
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Liaison Counsel for the §10(b) Class*

CERTIFICATE OF CONFERENCE

This is to certify that on July 28, 2020, the undersigned counsel, Court-appointed §10(b) Lead Counsel, contacted counsel for the plaintiffs in the Related Action to seek their consent to the relief sought by this Motion, which consent was not obtained.

/s/ Matthew L. Tuccillo
Matthew L. Tuccillo

CERTIFICATE OF SERVICE

This is to certify that on July 28, 2020, a true and correct copy of the foregoing document was filed on the Court's CM/ECF electronic filing system, and that by virtue of this filing, all attorneys of record will be served electronically with true and correct copies of this filing.

/s/ Matthew L. Tuccillo
Matthew L. Tuccillo